

**Executive Office of Public Safety and Security
Office of Grants and Research
Homeland Security Division**

Environmental Planning and Historic Preservation Guidance

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Introduction

The Executive Office of Public Safety and Security (EOPSS) has developed this guidance document to assist sub-recipients with adhering to Federal Environmental Planning and Historic Preservation (EHP) requirements. EHP review applies to all projects (regardless of Fiscal Year award) that use Federal Department of Homeland Security funds. The EHP review entails completing a Screening Form and providing details of the project involved. Depending on the complexity of the project, additional documentation and/or approvals from other agencies may be required.

Note that this document is **not** a substitute for the Federal EHP guidance. The Federal EHP guidance must be reviewed by all sub-recipients. Sub-recipients are ultimately responsible for compliance with the EHP requirements. Refer to FEMA Information Bulletins Nos. 329, 345, 351, 356, and 371 for more information. **IB #329 includes the most current EHP Screening Form.**

Compliance with the EHP requirement is a condition of the receipt and use of federal homeland security funds. Failure to comply with the EHP requirement may result in denial of federal homeland security funds.

When must EHP review occur?

If a sub-recipient proposes to use Federal Department of Homeland Security grant funds for an activity that requires an EHP Screening Form, this form must be reviewed and approved by DHS **before** the proposed project may begin.

What DOES NOT need EHP review?

According to FEMA Information Bulletin No. 345, the following activities and equipment **do not require the submission of an EHP Screening Form**. Sub-recipients should refer to IB #345 for more details.

- Planning
- Management and administration
- Classroom-based training
- Table top and functional exercises – **Any type of exercise that requires any type of ground disturbance or the building of temporary structures must still submit an EHP Screening Form for review.**
- Mobile* and portable equipment that do not require any fixed installation and may be transported.

* Note that although a complete EHP Screening Form will not be required, equipment transported on wheels (i.e., wheeled generators, light towers, message boards) may require some degree of review and approval. This can be done via email, through your EOPSS Program Coordinator, to the appropriate DHS or FEMA Program Analyst.

What DOES need EHP review?

Projects that require an EHP review include, but are not limited to:

- Physical security enhancements (i.e., installation of fencing, CCTV, surveillance cameras, bollards, motion detection systems, lighting, etc.)
- New installation, construction or renovation, including to the interior of a building
- Renovations, upgrades or modifications to structures 45 years or older, including equipment installed inside a building
- Communications towers and related equipment (i.e., repeaters, antennas, generators) and equipment shelters, including replacement of like equipment
- Ground disturbing activities (i.e., trenching, excavation, etc.)
- Field-based training and exercises that involve ground disturbing activities, use of explosives, toxic agents or otherwise have the potential to cause impact to the environment or historical resources. **This is only a requirement if the exercise or field training is not being conducted by a certified professional or at an existing facility with established procedures.**
- Purchase of equipment that contains the notation in the Authorized Equipment List (AEL): "This equipment has been identified as requiring an EHP review."
- Any other grant funded project that has the potential to cause environmental or historical impacts, such as those affecting
 - an historic or potentially historic property (these projects may also need review and approval from the Massachusetts Historical Commission);
 - a Native American traditional cultural property/religious site;
 - a current or proposed threatened or endangered plant or animal species or their habitat; and
 - a wetland, floodplain, river, lake, coastal area, or other body of water.

Contact your EOPSS Program Coordinator if there are questions regarding whether the proposed project requires the submission of an EHP Screening Form.

What is the process and length of an EHP review?

FEMA EHP reviews may take anywhere between two weeks to several months depending on the level of complexity of the project and the initial completeness and thoroughness of the Screening Form.

1. Complete an EHP Screening Form and submit it to your EOPSS Program Coordinator. **Submissions should be sent electronically as a Word, not PDF, file.** The Program Coordinator will conduct an initial review for completeness and thoroughness before submitting the Screening Form to the appropriate FEMA contact. At that point, FEMA will confirm receipt of the Screening Form and assign a case number.
2. After an initial review, FEMA may either return an EHP approval of the project or may request additional information from the sub-recipient. This communication will be made from FEMA to your EOPSS Program Coordinator. He/She will inform you of the status of the submitted screening form.

- A. **If a project receives an EHP approval notice**, EOPSS must still grant its full approval before the project may begin and funds may be expended. Sub-recipients typically have received EOPSS project level approval before the EHP process has begun, but this is not always the case. Your normal project approval process, including compliance with other requirements and special conditions, applies regardless of the EHP process. Full approval will be sent to you from your Program Coordinator.
- B. **If a project requires additional information**, your Program Coordinator will work with you to obtain the necessary information. Please note that delays in submitting the requested information will further hold up any EOPSS approval of the project.

For certain types of projects, FEMA must consult with other Federal and State agencies such as the U.S. Fish and Wildlife Service, State Historic Preservation Office, and the U.S. Army Corps of Engineers, as well as other agencies and organizations responsible for protecting natural and cultural resources.

An EHP approval from FEMA **does not** necessarily constitute full compliance with other Federal or State agencies and regulations. Your EOPSS Program Coordinator can work with you to determine other review requirements, if any, for your project.

Historical review of projects

Some projects, such as renovations and/or additions to a historic or potentially historic building or to structures within a historic district, may require an additional review by the Massachusetts Historical Commission (MHC) and/or a local historic commission.

Examples of these types of projects include, but are not limited to:

- Mounting security cameras inside or outside of a building;
- Installing a physical access control system;
- Mounting and hardwiring video displays; and
- Installing fencing or other barriers surrounding a building.

The review may be initiated through the submission of a Project Notification Form (PNF) to MHC. The PNF may be obtained either from your EOPSS Program Coordinator or downloaded from the MHC's website here: <http://www.sec.state.ma.us/mhc/mhcpdf/pnf.pdf>. Additional information about the MHC review including FAQs can be found here: <http://www.sec.state.ma.us/mhc/mhcrevcom/revcomidx.htm>.

While not required, EOPSS strongly recommends that for projects that may require historic review, the PNF be filed with the MHC prior to submitting the EHP Screening Form and the results from MHC's review be included with the EHP submission.

Communications projects

Communications projects, such as new antenna construction or collocations, must also abide with regulations issued by the Federal Communications Commission (FCC) and the U.S. Fish and Wildlife Service (USFWS) to be fully compliant and legal.

Communications tower guidance from USFWS can be found here: <http://www.fws.gov/habitatconservation/communicationtowers.html>.

As the FCC governs projects involving tower construction or collocations, sub-recipients should be familiar with FCC requirements for antenna registration, National Historic Preservation Act (NHPA) Section 106 requirements, and the Tower Construction Notification System (TCNS). Additional information from the FCC can be found here: http://wireless.fcc.gov/wtb/index.htm?job=towers_antennas.

The following types of projects will include coordination with the FCC:

- Projects requiring the use of the FCC Antenna Registration System;
- Projects involving the replacement or installation of communications towers; and
- Projects involving the collocation of antennas on existing towers.

Per FEMA guidance, if FCC involvement is triggered and NHPA Section 106 project exclusions are not applicable, sub-recipients will need to:

- 1) obtain a unique FCC Registration Number (FRN) and password using the FCC's Registration System (CORES). (<https://fjallfoss.fcc.gov/coresWeb/publicHome.do>),
- 2) complete the Tower Construction Notification System (TCNS) process (for new towers only) (http://wireless.fcc.gov/outreach/index.htm?job=tower_notification), and follow up by completing either FCC **Form 620 (new tower)** or **Form 621 (antenna collocation)**.

Sub-recipients are required to provide EOPSS with a copy of the completed Form 620 or 621 and the automated e-mail receipt generated by the TCNS system (if applicable).

If FCC involvement is required, sub-recipients should initiate the Section 106 review before completing and submitting a FEMA EHP Screening Form.

Resources

FEMA Information Bulletins #329, 345, 351, 356, and 371 provide additional information about EHP review and compliance. These documents can be found on the FEMA website here: <http://www.fema.gov/government/grant/bulletins/index.shtm>.

How to Complete the EHP Screening Form

Your EOPSS Program Coordinator can provide you with the most updated EHP Screening Form. It can also be downloaded as part of FEMA IB #329: <http://www.fema.gov/government/grant/bulletins/index.shtm>.

Below is a guide to completing the form.

- **Section A – Project Information:** This section may be left blank; it will be completed by your EOPSS Program Coordinator
- **Section B – Project Type:** Check all boxes that apply and provide a project description. Provide as much information and relevant details including the what, where, how, and why of the proposed project; dimensions of the work involved; changes in footprints and ground disturbance; areas included for construction access and staging areas; methods of equipment attachment; and any elements not funded by FEMA that are likely to be done as part of the project.
- **Section C – Project Details:** Complete any and all subsections for project types checked off in Section B. Project Type 6 – Communication towers, related equipment, and equipment shelters will require additional information to be confirmed or obtained. A separate guidance section for these types of projects can be found below.
- **Section D – Other Project Related Information:** Answer all questions that apply to the proposed project. Note that labeled digital color photographs **must** be included (See Section D, Question 7 of the Screening Form). Non-inclusion of photos will significantly delay the approval of the project. These photographs must include:
 - Ground-level color site photos that provide context and show where site work/physical installations are proposed. Photos must be labeled to identify installation area(s);
 - Ground-level color photographs of each side of the building involved;
 - Aerial color photograph with project limits outlined and with the location of any proposed installations identified; and
 - Aerial color photograph(s) showing all ground disturbing activities, if applicable.

NOTE: If the project is a building, show all sides of the entire building (at least from opposite corners), and the context of the building in its setting including the surrounding buildings and grounds. If the project is in a rural area, show the project site in the foreground with the surroundings in all four directions in the background.

The following is guidance on how to obtain an aerial photograph:

1. Obtain an aerial photo. Google Earth or Google Maps are available resources.
2. Copy the aerial image.
3. Open Microsoft Paint and paste the aerial image on the canvas. The image should now be in Microsoft Paint.
4. Using the paint resources such as line drawing and fill colors, label exactly where facility security enhancements will be installed i.e. fencing, lighting, cameras.
5. Cut and paste completed drawing into Word document and explain details of the facility security enhancements.
6. An example of a completed product is below.



Guidance to assist in completing EHP Screening Form communications-type projects

This section provides resources, explanations, and guidance on completing Section C, Project Type 6 and Section D of the EHP Screening Form. This guidance should not be considered final and is intended to supplement the sub-recipient's own findings and research.

6. ☐ Communication towers, related equipment, and equipment shelters

a. Provide a detailed description of the project

b. Provide project location (physical project address or latitude-longitude:.....

Websites that provide long/lat:

www.itouchmap.com

www.findlatitudeandlongitude.com

c. Provide the elevation above mean sea level of the project location:

Websites that provide elevation data. May also provide long/lat:

www.veloroutes.com/elevation

www.earthtools.org

d. For projects involving antenna(s) installations on existing towers:

- Provide the height of the existing tower:

- The height of the tower following the installation of the new antenna(s):

e. For new tower projects, state the total height (in feet) of the communication tower or structure including any antennae to be mounted:

- If the proposed tower height is greater than 199 feet above ground level, state why this is needed to meet the requirements of the project:

- Will the tower be free-standing or require guy wires? ☐ Free standing ☐ Guy wires

- If guy wires are required, state number of bands and how many:

- State why a guyed tower is needed to meet the requirements of this project:

- What kind of lighting will be installed, if any (for example: white strobe, red strobe, or steady burning?):.....

f. A general description of terrain (For example: mountainous, rolling hills, flat to undulating):

g. Describe the frequency and seasonality of fog/low cloud cover:.....

The city/town planning office may have information. If unable to answer, leave blank.

h. Provide a list of habitat types and land use on and adjacent to the tower site (within ½ mile), by acreage and percentage of total (e.g., woodland conifer forest, grassland, agriculture) waterbody, marsh):

The city/town planning office may have information. If unable to answer, leave blank.

Is there evidence of bird roosts or rookeries present within ½-mile of the proposed site? ☐ Yes ☐ No

The city/town planning office may have information. If unable to answer, leave blank.

If yes, describe:

Distance to nearest wetland area (for example: forested swamp, marsh, riparian, marine)

and coastline if applicable:

i. Distance to nearest telecommunication tower:

www.antennasearch.com provides locations of towers and antennas.

j. Have measures been incorporated for minimizing impacts to migratory birds? ☐ Yes ☐ No

• If yes, describe:

k. Has an FCC registration been obtained for this tower? ☐ Yes ☐ No

• If yes, provide Registration #:

Search the FCC's Antenna Structure Registration site, <http://wireless2.fcc.gov/UlsApp/AsrSearch/asrRegistrationSearch.jsp>, to find the seven digit registration number. Towers 200 ft and higher in height above ground level at its site and towers that may interfere with the flight path of a nearby airport must be registered.

The FCC provides an online system here: <http://wireless2.fcc.gov/UlsApp/AsrSearch/towairSearch.jsp> that helps determine if the tower needs to be registered.

l. Has the FCC E106 process been completed? ☐ Yes ☐ No

E106 stands for Electronic Section 106 and is a system to allow registrants to electronically submit the required forms (either Form 620 for new construction or Form 621 for collocation) to comply with Section 106 of the National Historic Preservation Act. While Massachusetts, currently, does not participate in the E106 program, Form 620 or Form 621 must still be submitted to the FCC. Respondents should check "No" and note that either Form 620 or Form 621 are still to be completed and submitted.

m. Has the FCC Tower Construction Notification System (TCNS) process been completed? ☐ Yes ☐ No

• If yes, attach all relevant environmental documentation submitted as part of the registration process including use of the Tower Construction Notification System (TCNS), if applicable. FRN#

The Tower Construction Notification System is an online system through the FCC that notifies federally recognized American Indian Tribes and Alaska Native Villages (collectively, "Tribes"), Native Hawaiian Organizations (NHOs), and State Historic Preservation Officers (SHPOs) of proposed communications tower constructions in areas of interest designated by the recipients. The TCNS also provides a means for Tribes, NHOs, and SHPOs to respond directly to the companies as to whether they have concerns about the proposed tower construction. Submission of information to the TCNS is a requirement for new tower construction (including replacement of towers) as well as for any project that increases the height of a tower by 10%.

If the TCNS process has been completed for the tower, then include all relevant correspondence and documentation as well as the completed FCC Form 620 or Form 621.

- n. Will any equipment or structures need to be installed? ☐ Yes ☐ No
- If yes, explain what type how and where this is proposed to be done (*attach additional pages, if pages needed*):
- o. Will equipment be co-located on existing FCC licensed tower or other structure?..... ☐ Yes ☐ No
- If yes, identify the type of structure:

Collocation, as defined by the FCC, means the mounting or installation of an antenna on an existing tower, building, or structure for the purposes of transmitting, and/or receiving radio frequently signals for communications purposes.

- p. Go to Page 6. Provide additional project details in Section D.

D. OTHER PROJECT RELATED INFORMATION (complete all that apply)

The following website may provide some additional EHP related guidance and resources to help complete this section <http://www.fema.gov/plan/ehp/ehp-applicant-help.shtm#5>.

1. If work is proposed on/in an existing building(s) or structure(s) provide the year built:.....
- If the building or structure involved is over 45 years old and significant renovation, rehabilitation, or modification has occurred, please provide the year(s) and briefly describe the nature of remodeling:

If not already known, local town assessors will have records of the building including the year built. Many town assessors have searchable online databases.

2. If the project affects the exterior of the building, are there any known buildings and/or structures that are 45 years or older in the immediate project area?..... ☐ Yes ☐ No/NA
- If yes, please provide the location, ground-level color photos of these, and identify their location(s) on the aerial map.
3. Is the building or structure on which work is proposed a historic property or in a historic district, or are there any adjacent historic properties? ☐ Yes ☐ No
- Information about historic properties may be found on the National Register of Historic Places at <http://nrhp.focus.nps.gov/natreghome.do?searchtype=natreghome> or the respective State Historic Preservation Office may have information on their website.
4. Will ground disturbance be required to complete the project? ☐ Yes ☐ No
- If yes, provide total extent (depth, length and width) of each unique ground disturbing activity. Light poles, bollards and fencing are each unique ground disturbing activities (For example, six light poles, 24" dia. x 4' deep; trenching 12" x 500' x 18" deep):
5. Has the ground been previously disturbed?..... ☐ Yes ☐ No
- If yes, please describe the current disturbed condition of the area (for example, parking lot, roadway right-of-way, commercial development):
6. Are there technical drawings or site plans available, if yes please attach. ☐ Yes ☐ No
7. Attach color site photographs:
- Ground-level color site photos that provide context and show where site work/physical installations are proposed (label photos),
 - Ground-level color photographs of each side of the building involved.

- Aerial color photograph with project limits outlined and with the location of any proposed installations identified.
 - Aerial color photograph(s) showing all ground disturbing activities (if applicable).
8. Is the project part of an approved plan such as a Master Plan or an Implementation Plan or any larger action/project? ☐ Yes ☐ No
- If yes, provide the plan/project name and brief description:
9. Is there any *previously* completed environmental documentation for this project (for example: Environmental Impact Statement, Environmental Assessment, wetland delineation, archaeological study)? ☐ Yes ☐ No
- If yes, please attach documentation. If a NEPA document, what was the decision? (*Check one, and please attach*):
- ☐ Finding of No Significant Impact (FONSI) or
- ☐ Record of Decision (ROD)
- Name of preparing agency: _____
- Date approved: _____
10. Is there any *previously* completed agency coordination for this project (for example correspondence with the U.S. Fish and Wildlife Service, State Historic Preservation Office (SHPO), Tribal Historic Preservation Office (THPO), or permitting agencies? ☐ Yes ☐ No
- If yes, please attach documentation unless included in NEPA documentation identified above.

The SHPO is the Massachusetts Historic Commission. In advance of submitting the EHP Screening Form, it is advised that the respondent first complete a Project Notification Form (PNF) and include the response provided by the MHC. The PNF should be completed if your project involves a structure 45 years or older, is an historic structure or is within a historic district, or if the project involves breaking ground. This includes, but is not limited to, trenching, excavating or construction where the ground will be disturbed.

U.S. Fish and Wildlife Service has provided EOPSS with a consultation document for “existing and new telecommunication facilities in relation to the presence of federally-listed or proposed, threatened or endangered species, critical habitat, wilderness areas and/or wildlife preserves.” Your EOPSS Program Coordinator will provide this consultation document if your project involves the following types of action to an existing facility:

- Collocation of new antenna facilities on/in existing structures; or
- Repair or replacement of existing towers and/or equipment, provided such activities do not significantly increase the existing tower mass and height, or require the addition of guy wires.

If proposing a new telecommunications facility, then the above mentioned consultation document cannot be used. Follow the sequence of project review steps from the U.S. Fish and Wildlife Service website here: [http://www.fws.gov/newengland/EndangeredSpec-Consultation Project Review.htm](http://www.fws.gov/newengland/EndangeredSpec-Consultation%20Project%20Review.htm).

11. Provide FEMA Flood Insurance Rate Map (FIRM), with project limits outlined. FIRM maps can be created from: <http://www.fema.gov/hazard/map/firm.shtm>
11. Provide U.S. Fish and Wildlife Service, National Wetlands Inventory (NWI) Map created from: <http://www.fws.gov/wetlands/Data/Mapper.html>